

**ATTACHMENT A**  
**Remarks**

Claims 17, 18, 21, 24-26, 30-34, 41-44 and 61 have been rejected under 35 U.S.C 102(b) as being "anticipated by" the newly cited Martin et al reference ("Martin"). This rejection is respectfully traversed.

For ease of discussion, it is noted that a first group of claims is formed by independent claims 17 (primary unit), 32 (system), 42 (portable electrical or electronic device) and 61 (primary unit using "means-plus-a-function" language, and the claims dependent thereon. Among other features, the claims of the first group recite that (a) the device can be placed "in any position along a line extending in one translational dimension across the power transfer surface to receive power inductively" and (b) there is provided "at least one attaching element...which temporarily attaches the device to the primary unit in any said position along said line."

Turning to the Martin reference, it is agreed that Martin discloses a inductive charging system in which a light unit having a housing can receive power inductively from a charging cradle 50. However, it is respectfully submitted that the Examiner has misinterpreted Figures 3 and 4 of Martin, as discussed below.

Figures 3 and 4 of Martin show two mutually perpendicular cross sections through the housing (see column 4, lines 1 and 2). From Figures 3 and 4 it can be seen that the interior wall of housing 12 has four angled (sloping) walls 19. On two of the opposing angled walls 19, rechargeable batteries are mounted "by means of Velcro™

28." A secondary coil is disposed on the angled wall 19 between the rechargeable batteries 34 (column 5, lines 9-13).

Considering the argument presented at page 3 of the Office Action, although the secondary coil 36 appears centrally in Figure 3, it is, in fact, disposed on one of the angled walls 19 (as is clear from Figure 4) and is not centrally placed within the housing. It is also noted that loop 13 at the base of the housing is parallel with the drawing page in Figure 3 and perpendicular to the drawing page in Figure 4.

Turning to cradle 50, Figure 4 of Martin shows that the primary coil 45 is set to one side and is angled in parallel with the intended location of angled walls 19 when charging is taking place. In particular, Martin discloses that the rechargeable batteries 34 can be recharged by placing the housing in the charging cradle with the loop aligned in the recess 59 (column 5, lines 46-49). Although the recess does not appear to be labeled in Figures 3 and 4, it is clear from the description that the recess serves to align the primary coil 45 and the secondary coil 36 with one another (column 5, lines 49-51).

With this background, it is respectfully submitted that because of the shape of the loop 13 and the recess 59, the housing may sit in the cradle 50 in only two different ways. The first way is that shown in Figure 4 and a second potential way is that shown in Figure 4, except with the housing 12 rotated by 180° about its axis so that the secondary coil 36 is on the right-hand side. However, because of the locations of the primary and secondary coils 36, only one of these ways, viz., the first way, is suitable for transferring power inductively. Accordingly, it is respectfully submitted that Martin does not disclose feature (a) or feature (b) described above. The housing 12 is only

positionable in one way to receive power. The requirement of "in any position" necessary for both features (a) and (b) is not disclosed in Martin.

Claims 17, 23, 27-29, 32, 35-38, 40, 42, 61, 72-81, 84-93, and 96 are rejected under 35 U.S.C 103(a) as being unpatentable over Koreis in view of Martin. This rejection is respectfully traversed. It is respectfully submitted that Koreis does not disclose either feature (a) or (b) discussed above. In Koreis, the primary and secondary inductive coils 12 and 16 are shown as being a matched pair (i.e., they are the same size). Therefore, the "in any position" feature of this group of claims is not disclosed or suggested by Koreis. In addition, Koreis does not disclose any attaching elements.

In summary, for the reasons set forth above, it is respectfully submitted that the claims of the first group of patentable over the Martin reference alone and over the combination of the Koreis and Martin references.

Claim 64 has been rejected under 35 U.S.C 102(b) as being "anticipated by" Koreis. This claim has been canceled in order to expedite the prosecution.

Turning now to a second group of claims, this group is comprised of independent claims 72 (primary unit), 84 (system), 93 (portable electrical or electronic device) and 96 (primary unit using "means-plus-a-function" language) and the claims dependent thereon. The relevant rejection here is that based on the combination of Koreis and Martin.

Among other features, the claims of the second group recite that (a) the device can be placed in any position "within an uninterrupted two-dimensional area" of the power transfer surface, and (b) there is provided "at least one attaching element...which temporarily releasably attaches the device to the primary unit." The second group of

claims is concerned with addressing the problem of enabling positive mechanical retention of a device on a power transfer surface without limiting where the device must be placed on that power transfer surface. Implicitly, this concern involves a device having a footprint that is substantially smaller than the power transfer surface so that the device may be placed in any position "within" an uninterrupted two-dimensional power transfer surface.

Turning to the Koreis reference, this patent discloses a two-dimensional power transfer surface, for example, in connection with inductive coil 12 located in a seatback tray in an aircraft. However, Koreis does not address, or even suggest, the problem solved by the present invention as claimed in the second group of claims. In this regard, it is neither disclosed or suggested in Koreis that the device to be charged should have a substantially smaller footprint than the power transfer surface of the primary unit (such that the device may be placed in any position "within" an uninterrupted two-dimensional area of the power transfer surface). On the contrary, Koreis discloses a two-part transformer (column 2, line 63) in which the primary and secondary coils are of the same size as one another (Figures 1 and 3). Further, as indicated above, there is no disclosure or suggestion in Koreis of any attaching elements.

It is respectfully submitted that having the teachings of Koreis at hand, one of ordinary skill in the art would not consider altering the size relationship between the primary and secondary coils in that there would be no reason to do so. It would also be no reason to consider the use of attaching elements. The system disclosed by Koreis is intended for so-called "mass transit" modes of transportation (airplanes, buses, ships

and the like), and sudden motion in such "mass transit" modes of transportation is an extremely rare event. Consequently, such sudden motion is not considered in all in Koreis and, similarly, one of ordinary skill in the art would not be motivated to consider the possibility of sudden motion. Further, even if a person of ordinary skill in the art, in considering the teachings of Koreis, turned to Martin, that person would find that Martin does not concern two-dimensional charging surfaces, and would consider the teaching in Martin to be incompatible with Koreis. A person of ordinary skill in the art certainly would not consider the "Velcro™ 28" used in Martin, as it is not used between the primary unit (cradle) and the device (light housing) but rather is used inside the light housing. For this reason, a person of ordinary skill would not focus on the "Velcro™ 28" because that person would not be concerned with inner connections between inner parts of the device.

In summary, for the reasons set forth above, it is respectfully submitted that the claims of the second group are patentable over the combination of Koreis and Martin.

Allowance of the application in its present form is respectfully solicited.

**END REMARKS**